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14 *Ultimate Fighting Championship and UFC*

15 UNITED STATES DISTRICT COURT

16 DISTRICT OF NEVADA

17 Cung Le, Nathan Quarry, Jon Fitch, Brandon
18 Vera, Luis Javier Vazquez, and Kyle
Kingsbury on behalf of themselves and all
19 others similarly situated,

20 Plaintiffs,

21 v.

22 Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

23 Defendant.
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Case No.: 2:15-cv-01045-RFB-(PAL)

**DECLARATION OF STACEY K.
GRIGSBY IN SUPPORT OF ZUFFA,
LLC'S MOTION TO SEAL PORTIONS
OF PLAINTIFFS' OPPOSITION TO
ZUFFA'S MOTION TO SEAL**

1 I, Stacey K. Grigsby, declare as follows:

2 1. I am an attorney admitted to practice before the courts in the states of New York
3 and the District of Columbia and am admitted Pro Hac Vice to practice before this Court. I am
4 Counsel in the law firm Boies, Schiller & Flexner LLP, and represent Defendant Zuffa, LLC
5 (“Zuffa”) in this case.

6 2. I make this declaration in support of Zuffa, LLC’s Motion to Seal Portions of
7 Plaintiffs’ Opposition to Zuffa’s Motion to Seal. Based on my review of the files and records in
8 this case, I have firsthand knowledge of the contents of this declaration and could testify thereto.

9 3. Zuffa seeks to file under seal designated portions of Plaintiffs’ Opposition as well
10 as a portion of one exhibit identified as Exhibit 2 to the Declaration of Matthew S. Weiler in
11 Support of Plaintiff’s Opposition to Zuffa, LLC’s Motion to Seal. This declaration is submitted to
12 provide the factual and legal support for the filing of this material under seal.

13 4. Federal Rule of Civil Procedure 26(c) provides that the Court may “issue an order
14 to protect a party or person from annoyance, embarrassment, oppression or undue burden or
15 expense” by “requiring that a trade secret or other confidential research, development, or
16 commercial information not be revealed or be revealed only in a specific way.” Further, “[c]ourts
17 generally accept attorney-client privilege and the work-product doctrine as a ‘compelling reason’
18 justifying a motion to seal.” *Hanson v. Wells Fargo Home Mortg., Inc.*, No. C13-0939JLR, 2013
19 WL 5674997, at *3 (W.D. Wash. Oct. 17, 2013) (citation omitted); *see also Asdale v. Int’l Game*
20 *Tech.*, No. 3:04-cv-703-RAM, 2010 WL 2161930, at *5 (D. Nev. May 28, 2010) (accepting
21 attorney-client privilege and the work-product doctrine as both good cause and a compelling
22 reason to seal nondispositive and dispositive motions respectively); *JL Beverage Co., LLC v.*
23 *Beam, Inc.*, No. 2:11-cv-00417-MMD-CWH, 2014 WL 5017862, at *3 (D. Nev. Oct. 7, 2014)
24 (sealing portions of motion and certain exhibits “to protect against disclosure of attorney-client
25 privilege and attorney work-product information”).

26 5. Public disclosure of the following portions of Plaintiffs’ Opposition (Page 5:20-25,
27 Page 6:1 and fn.6 at Line 22, Page 7:2-6) as well as Exhibit 2 to the Weiler Declaration would
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1 expose Zuffa's counsel's work product as to the litigation that was anticipated that led to the
2 creation of the work product documents

3 6. It is my understanding that Zuffa works to protect confidential work product
4 information from public disclosure.

5
6 I declare under penalty of perjury under the laws of the United States of America that the
7 foregoing facts are true and correct. Executed this 17th day of October, 2016, in Washington,
8 DC.

9
10 /s/ Stacey K. Grigsby
Stacey K. Grigsby